

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:

ALEXANDER E. JONES,

Debtor.

Chapter 7

Case No. 22-33553 (CML)

TRUSTEE'S WITNESS AND EXHIBIT LIST

FOR THURSDAY, JANUARY 23, 2025, HYBRID HEARING ON

TRUSTEE'S EXPEDITED MOTION FOR ENTRY OF AN ORDER APPROVING
SETTLEMENT AMONGST THE TRUSTEE, PQPR HOLDINGS LIMITED LLC, DAVID
JONES, CAROL JONES, PLJR HOLDINGS LLC, AND JLJR HOLDINGS LLC PURSUANT TO
FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019

[Relates to Dkt. No. 1005]

Christopher R. Murray in his capacity as Chapter 7 Trustee (the “**Trustee**”) for the bankruptcy estate of Alexander E. Jones (“**Alex Jones**”) files this *Witness and Exhibit List* for the hybrid hearing to be held on Thursday, January 23, 2024, at 9:00 a.m. (prevailing Central Time) (the “**Hearing**”) before the Honorable Christopher Lopez at the United States Bankruptcy Court for the Southern District of Texas, Courtroom 401, 515 Rusk Street, Houston, Texas 77002, regarding the *Trustee's Expedited Motion for Entry of an Order Approving Settlement Amongst the Trustee, PQPR Holdings Limited LLC, David Jones, Carol Jones, PLJR Holdings LLC, and JLJR Holdings LLC Pursuant to Federal Rule of Bankruptcy Procedure 9019* (“**PQPR 9019 Motion**”)[Dkt. No. 1005].

EXHIBITS

No.	Description	M A R	O F F	O B J	A D M	D A T	Disposition After Trial
1.	<i>Trustee's Expedited Motion for Entry of an Order Approving Settlement Amongst the Trustee, PQPR Holdings Limited LLC, David Jones, Carol Jones, PLJR Holdings LLC, and JLJR Holdings LLC Pursuant to Federal Rule of Bankruptcy Procedure 9019 and the Stipulation and Agreed Order attached thereto [Dkt. No. 1005]</i>						
2.	Promissory Note by Free Speech Systems, LLC in favor of PQPR Holdings Limited, LLC, dated as of August 13, 2020						
3.	Security Agreement by Free Speech Systems, LLC in favor of PQPR Holdings Limited, LLC, dated as of August 13, 2020						
4.	Promissory Note by Free Speech Systems, LLC in favor of PQPR Holdings Limited, LLC, dated as of November 10, 2021						
5.	UCC Financing Statement						
6.	Free Speech Systems, LLC's <i>Amended Complaint</i> and the exhibit attached thereto [Adv. No. 23-03127, Dkt. No. 5]						
7.	<i>PQPR Holdings Limited LLC's, JLJR Holdings LLC's, and PLJR Holdings LLC's Motion for Partial Summary Judgment</i> , and the exhibits attached thereto [Adv. No. 23-03127, Dkt. No. 44]						
8.	<i>Response of Free Speech Systems, LLC to the Motion for Partial Summary Judgment Filed by Defendants PQPR Holdings Limited LLC, JLJR Holdings LLC, and PLJR Holdings LLC</i> [Adv. No. 23-03127, Dkt. No. 55]						
9.	<i>Memorandum of Law of the Sandy Hook Families in Opposition to PQPR Holdings Limited LLC's, JLJR Holdings LLC's, and PLJR Holdings LLC's Motion for Partial Summary Judgment</i> (redacted) [Adv. No. 23-03127, Dkt. No. 59]						

No.	Description	M A R	O F F	O B J	A D M	D A T	Disposition After Trial
10.	<i>Connecticut Families' Motion for Summary Judgment</i> [Adv. No. 23-03127, Dkt. No. 61]						
11.	<i>Defendants' Response to the Connecticut Families' Motion for Summary Judgment</i> [Adv. No. 23-03127, Dkt. No. 65]						
12.	PQPR Proof of Claim, including all attachments thereto [FSS Claim No. 11-1]						
13.	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 7 case or related adversary proceeding, included Adv. No. 23-03127.						
14.	Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party						
15.	Any exhibit listed by any other party						

WITNESSES

1. Christopher R. Murray, Trustee for the Alex Jones bankruptcy estate.
2. Any witness and rebuttal witnesses listed by any other party.

No objection to the PQPR 9019 Motion was filed by the January 21, 2025 12:00 p.m. deadline set by the Court. A *Certificate of No Objection* has been filed on the docket in this case [Dkt. No. 1026]. The Trustee reserves the right to amend and/or supplement this Witness and Exhibit List as necessary in advance of the Hearing. The Trustee also reserves the right to use any exhibits presented by any other party and to ask the Court to take judicial notice of any document. Finally, the Trustee reserves the right to introduce any previously admitted exhibit.

Dated: January 21, 2025.

Respectfully submitted,

JONES MURRAY LLP

By: /s/ Erin E. Jones

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**COUNSEL TO
CHRISTOPHER R. MURRAY,
CHAPTER 7 TRUSTEE**

CERTIFICATE OF SERVICE

I certify that on January 21, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System in the United States Bankruptcy Court for the Southern District of Texas.

/s/ Erin E. Jones
Erin E. Jones